

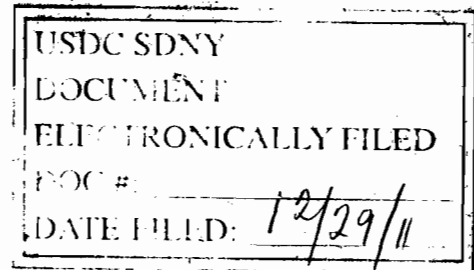


THE BLANCH LAW FIRM, P.C.

261 MADISON AVENUE, 12TH FLOOR NEW YORK, NY 10016 T (212) 736-3900 F (212) 736-3910

December 27, 2011

ATTN: Hon. Victor Marrero, Justice
United States District Court
Southern District of New York
Daniel Patrick Moynihan Building
500 Pearl Street
New York, New York 10007-1312



Re: United States V. Vaughn Richmond, et.al.
10 Cr. 00243 (VM-1)

Dear Judge Marrero:

Please accept this letter as a formal request for an adjournment of Mr. Richmond's January 3, 201² surrender date to March 5, 2012. This is Mr. Richmond's first request of this nature. Our Firm has met with the defendant, Vaughn Richmond, several times over the past few weeks as well as discussed our request with Assistant United States Attorney Justin A. Anderson. The government is aware of the reasons for our requests and does not oppose the request.

As this Court is aware Mr. Richmond was convicted after a guilty plea of Mortgage and Wire Fraud and sentenced to a term of 12 months and 1 Day, 3 years post release supervision with \$1,879,030.26 restitution. Throughout the case Mr. Richmond was fully compliant with the terms of his release and processes of this Court. Mr. Richmond is currently released on \$50,000 bail.

Mr. Richmond currently has custody of his ^{//}9 year old daughter who is scheduled to return to Mr. Richmond's custody after his release. Mr. Richmond is aware that he is jointly and severally liable for \$1,879,030.26 in restitution and is currently in the position to obtain substantial portions of the restitution mandated by the Court. Since his conviction Mr. Richmond has realized that his ability to conduct business has been significantly hampered based upon the conviction. Matters of business that were pending prior to Mr. Richmond's conviction were ultimately canceled by involved parties, when they learned of the conviction. These matters have prolonged and hampered the defendant's ability to raise restitution and funds needed for the care of his 9 year old daughter during his incarceration. By allowing Mr. Richmond additional time to obtain substantial restitution and finalize matters related to his daughter's care during incarceration, this would enable Mr. Richmond to make the victims whole, insure that his

daughter is properly cared for and transitioned for his incarceration, as well as finalize matters that would enable him to re-enter society much more successfully as a law abiding citizen in a more financially stable position with less financial burdens.

Though the government does not oppose our request, AUSA Anderson has requested that a brief conference be held to permit the Court to pronounce a new surrender date in open Court if the Court authorizes a new surrender date of March 5, 2012 or as close to that date as this Court deems appropriate. We are hopeful that this Court could entertain our request on either December 28 or 29, 2011 at a time most convenient for the Court.

In closing, I would like to thank the Court in advance for its time and consideration in this matter.

Respectfully,

/s/ Ryan G. Blanch

Ryan G. Blanch

Cc: Justin A. Anderson, Asst. U.S. Attorney, SDNY

